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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

S.I. by and through her Guardian Ad Litem,
Jeremiah Ross,

Plaintiff,

v.

STATE OF OREGON, by and through its
Department of Human Services; LAURA
LANGSLETT HALL, an individual; JOHN
CASHMAN, and individual; LISA SIMPSON,
and individual; and SAM WALTER, an
individual,

Defendants.

v.

STATE OF OREGON, by and through its
Department of Human Services; LAURA
LANGSLETT HALL, an individual; JOHN
CASHMAN, and individual; LISA SIMPSON,
and individual; and SAM WALTER, an
individual,,

Third-Party Plaintiff,

v.

Case No.

NOTICE OF REMOVAL

JAVON INGRAM, LARISSA DUCAN and
PAUL DUCAN,

Third-Party Defendants.

PLEASE TAKE NOTICE that the civil case of the above captioned case *S.I., a minor by and through Jeremiah Ross, GAL*, Multnomah County Circuit Court Case No. 23CV15759 is hereby removed to the United States District Court for the District of Oregon, Portland Division, pursuant to 28 USC § 1331, § 1441 and 1446. The grounds for removal are as follows:

1. On April 17, 2023, plaintiff filed her Complaint in the Multnomah County Circuit Court, Case No. 23CV15759. A copy of the Complaint is attached as **Exhibit 1**.
2. Defendant Department of Human Services was served on April 17, 2023. A copy of the service documents for DHS is attached as **Exhibit 2**.
3. A copy of the answer filed by DHS is attached as **Exhibit 3**.
4. A copy of the service documents for Javon Ingram is attached as **Exhibit 4**.
5. A copy of the answer filed by Larissa Ducan and Paul Ducan is attached as **Exhibit 5**.
6. A copy of the order of default for defendant Javon Ingram is attached as **Exhibit 6**.
7. A copy of the limited judgment of default of Javon Ingram is attached as **Exhibit 7**.
8. On November 4, 2024, plaintiff filed for leave to amend her Complaint, to add additional claims. The motion was granted on November 13, 2024. A copy of the order is attached as **Exhibit 8**.
9. Pursuant to 28 USC § 1446(a), a copy of the Amended Complaint is attached as **Exhibit 9**.
10. The Amended Complaint contains claims for violation of the United States Constitution, as well as state law claims of negligence and violation of the Abuse of a Vulnerable Person Act. Specifically, the first and second claims for relief assert claims under 42 USC § 1983. The Court has jurisdiction over the civil rights claims pursuant to 28 U.S.C. § 1331, since those claims raise federal questions. This court has supplemental jurisdiction over the state law claims pursuant to 28 U.S.C. § 1367(a).

11. Pursuant to 28 USC § 1446(d), a copy of this Notice of Removal is being served upon Plaintiff and a copy has been e-filed with the Multnomah County Circuit Court.

12. Plaintiff does not oppose removal.

13. Defendant Javon Ingram was defaulted after service of original complaint. Defendants Larissa Ducan and Paul Ducan have entered appearances and been served with the Notice of Removal. No objections to removal have been received.

WHEREFORE, the above captioned case is removed from the Multnomah County Circuit Court and to the U.S. District Court for the District of Oregon.

DATED November 26, 2024.

Respectfully submitted,

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